

\*\*\*\*\*  
\*\*\* ACTIVITY REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO. 3668  
CONNECTION TEL 14042675992p001  
CONNECTION ID  
START TIME 04/15 09:20  
USAGE TIME 02'24  
PAGES 6  
RESULT OK

**TELECOPIER COVER SHEET**

**WILLOUGHBY & HOEFER, P.A.  
1022 CALHOUN STREET, SUITE 302  
POST OFFICE BOX 8416  
COLUMBIA, SC 29202-8416**

**TELEPHONE NO. 803-252-3300  
TELECOPIER NO. 803-256-8062**

TO: Greg Darnell  
TELECOPIER NO: 404-267-5992  
FROM: John M. S. Hoefer, Esquire  
DATE: April 15, 1997 TIME: 9:20 A.M.  
TOTAL NUMBER OF PAGES, INCLUDING COVER SHEET: 6

**Message:**

**Note:** Original to be forwarded via:

1. First Class U.S. Postal Service \_\_\_\_ yes xx no
2. Federal Express \_\_\_\_
3. \_\_\_\_ Other

\*\*\*\*\*  
\*\*\* ACTIVITY REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO. 3667  
CONNECTION TEL 15124773845p001  
CONNECTION ID MCI TELECOMMUNIC  
START TIME 04/15 09:17  
USAGE TIME 02'24  
PAGES 6  
RESULT OK

**TELECOPIER COVER SHEET**

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1022 CALHOUN STREET, SUITE 302  
POST OFFICE BOX 8416  
COLUMBIA, SC 29202-8416**

**TELEPHONE NO. 803-252-3300  
TELECOPIER NO. 803-256-8062**

TO: Jeff Champlin  
TELECOPIER NO: 512-477-3845  
FROM: John Hofer  
DATE: April 15, 1997 TIME: 9:20am  
TOTAL NUMBER OF PAGES, INCLUDING COVER SHEET: 6  
Message:

Note: Original to be forwarded via:

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2. Federal Express \_\_\_\_
3. \_\_\_\_ Other

**MCNAIR LAW FIRM, P.A.**  
ATTORNEYS AND COUNSELORS AT LAW

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COLUMBIA, SOUTH CAROLINA 29201

MAILING ADDRESS:  
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COLUMBIA, SOUTH CAROLINA 29211  
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FACSIMILE 803/799-9804

CHARLESTON OFFICE  
140 EAST BAY STREET  
POST OFFICE BOX 1431  
CHARLESTON, SC 29402  
TELEPHONE 803/723-7831  
FACSIMILE 803/722-3227

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121 SCREVEN STREET  
POST OFFICE DRAWER 418  
GEORGETOWN, SC 29442  
TELEPHONE 803/546-6102  
FACSIMILE 803/546-0086

GREENVILLE OFFICE  
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POST OFFICE BOX 447  
GREENVILLE, SC 29602  
TELEPHONE 864/271-4940  
FACSIMILE 864/271-4015

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THE JADE BUILDING, SUITE 204  
52 NEW ORLEANS ROAD  
POST OFFICE DRAWER 7787  
HILTON HEAD ISLAND, SC 29928  
TELEPHONE 803/785-5169  
FACSIMILE 803/842-3310

MYRTLE BEACH OFFICE  
FOUNDERS CENTRE/SUITE 403  
2411 OAK STREET  
MYRTLE BEACH, SC 29577  
TELEPHONE 803/444-1107  
FACSIMILE 803/444-4729

SPARTANBURG OFFICE  
SPARTAN CENTRE/SUITE 306  
101 WEST ST. JOHN STREET  
POST OFFICE BOX 5137  
SPARTANBURG, SC 29304  
TELEPHONE 864/542-1300  
FACSIMILE 864/542-0705

April 15, 1997

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APR 16 1997

The Honorable Charles W. Ballentine  
Executive Director  
South Carolina Public Service Commission  
111 Doctors Circle  
Columbia, South Carolina 29211

Willoughby & Hoefler, P.A.

**Re: Application of MCImetro Access Transmission Services, Inc.  
for a Certificate of Public Convenience and Necessity to Provide  
Telecommunications Services Throughout the State of South Carolina  
Docket No. 97-115-C**


Dear Mr. Ballentine:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter, I am serving all parties of record.

Please clock-in a copy and return in the enclosed self-addressed envelope.

Thank you for your assistance.

Very truly yours,



Margaret M. Fox

MMF/sg  
Enclosures

cc: Parties of record

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 97-115-C

Re: Application of MCImetro Access Transmission	)	
Services, Inc. for a Certificate of Public	)	
Convenience and Necessity to Provide	)	<b>PETITION</b>
Telecommunications Services	)	<b>TO</b>
Throughout the State of South Carolina	)	<b>INTERVENE</b>
	)	

---

In response to the Commission's Notice of the filing of MCImetro Access Transmission Services, Inc.'s Application for a Certificate of Public Convenience and Necessity to authorize it to provide telecommunications services, including resold and facilities-based local exchange telecommunications, throughout the State of South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would

potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

By: Margaret M. Fox  
M. John Bowen, Jr.  
Margaret M. Fox  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

ATTORNEYS FOR THE SOUTH  
CAROLINA TELEPHONE COALITION

Columbia, South Carolina  
April 15, 1997

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 97-115-C

Re:    Application of MCImetro Access Transmission    )  
      Services, Inc. for a Certificate of Public        )  
      Convenience and Necessity to Provide         )  
      Telecommunications Services                   )  
      Throughout the State of South Carolina        )

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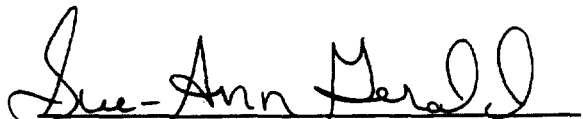
**CERTIFICATE OF SERVICE**

I, Sue-Ann Gerald, do hereby certify that this day I caused to have served the foregoing  
Petition to Intervene to the below named party of record, by having same delivered as indicated,  
this 15th day of April, 1997, and addressed as follows:

**U.S. MAIL - FIRST CLASS POSTAGE AFFIXED:**

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202-8416

Harry M. Lightsey, Esquire  
1600 Hampton Street, Suite 821  
Columbia, SC 29201

  
Sue-Ann Gerald

Columbia, South Carolina



Phillip S. Porter  
Administrator  
and  
Consumer Advocate

The State of South Carolina  
Department of Consumer Affairs

2801 DEVINE STREET  
P.O. BOX 5757  
COLUMBIA, S.C. 29250-5757  
EQUAL OPPORTUNITY EMPLOYER

Commissioners  
Lonnie Randolph, Jr.  
Chairman  
Columbia  
Barbara B. League  
Vice Chairman  
Greenville  
Jim Miles  
Secretary of State  
Columbia  
Lehman A. Moseley, Jr.  
Greenville  
DeAnna S. Trout  
Moncks Corner  
Lillian C. Bloom  
Greenville  
Ron G. Skipper  
Hartsville  
William P. Fleck  
Anderson  
Gregory J. English  
Simpsonville

April 24, 1997

Honorable Charles W. Ballentine  
South Carolina Public Service Commission  
P.O. Drawer 11649  
Columbia, South Carolina 29211

Re: MCImetro Access Transmission Services, Inc.  
Docket No. 97-115-C

Dear Mr. Ballentine:

Enclosed please find an original and five copies of the Consumer Advocate's **Petition to Intervene** in the above referenced case. Copies have been served on all parties listed on the attached Certificate of Service.

Sincerely,

Elliott F. Elam, Jr.  
Staff Attorney

Enclosure(s)  
cc: parties of record

RECEIVED

APR 25 1997

Willoughby & Hoefler, P.A.

TELEPHONE (AREA CODE 803)  
ADMINISTRATION  
734-9458  
ACCOUNTING  
734-9450

PUBLIC INFORMATION  
734-9462

CONSUMER COMPLAINTS  
734-9452  
WATS 1-800-922-1594

INVESTIGATORS  
734-9461  
ENFORCEMENT  
734-9460

CONSUMER ADVOCACY  
734-9464  
FAX: 734-9365

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 97-115-C

IN THE MATTER OF:	)	
	)	
MCImetro Access Transmission	)	
Services, Inc. - Application for a	)	PETITION TO INTERVENE
Certificate of Public Convenience	)	
<hr/>	)	

Philip S. Porter, Consumer Advocate for the State of South Carolina, respectfully petitions the South Carolina Public Service Commission for permission to intervene in the above referenced Docket and represents as follows:

1. MCImetro Access Transmission Service, Inc. filed an Application with the Commission seeking a Certificate of Public Convenience to provide telecommunications as a telephone utility.
2. The Commission has assigned Docket No. 97-115-C to this matter.
3. Philip S. Porter is the duly appointed and qualified Consumer Advocate for the State of South Carolina. Pursuant to S.C. Code Ann. § 37-6-604 (Supp. 1996), and 26 S.C. Code Ann. Regs. 103-830 et seq., (1976 and Supp. 1996), the Consumer Advocate has the discretionary duty to provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services or to enact regulations or establish policies related thereto, and in that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 97-115-C.



4. The Consumer Advocate's position is that the Commission should take steps to encourage the development of competition in the local exchange market in accordance with the Telecommunications Act of 1996.

**WHEREFORE**, the Petitioner, in order to represent the consumer interest of the State of South Carolina, requests:

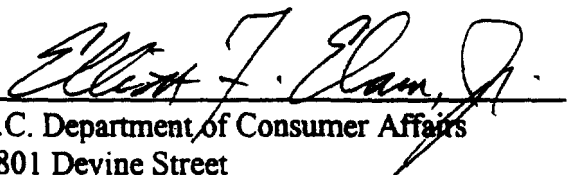
- (1) that the Commission grant this Petition to Intervene as a formal party of record on behalf of the consumers of the State of South Carolina;
- (2) a copy of all filings, pleadings, testimony and exhibits filed by all parties of record concerning this proceeding.

Philip S. Porter  
Consumer Advocate

Nancy Vaughn Coombs  
Deputy Consumer Advocate

Elliott F. Elam, Jr.  
Staff Attorney

By:

  
S.C. Department of Consumer Affairs  
2801 Devine Street  
P.O. Box 5757  
Columbia, South Carolina 29250-5757  
(803) 734-9464 Ext. 138

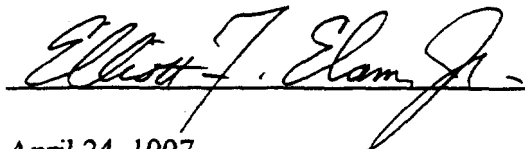
April 24, 1997

**CERTIFICATE OF SERVICE**

This is to certify that I, Elliott F. Elam, Jr., on behalf of Philip S. Porter, Consumer Advocate, have served this day the foregoing **Petition to Intervene** upon the person(s) named below, at the address(es) set forth, by deposit in the United States mail, postage prepaid.

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
P.O. Box 8416  
Columbia, SC 29202-8416

Harry M. Lightsey, III, Esquire  
BellSouth Telecommunications, Inc.  
P.O. Box 752  
Columbia, SC 29202

A handwritten signature in cursive script, reading "Elliott F. Elam, Jr.", written over a horizontal line.

April 24, 1997  
Columbia, South Carolina

**MCNAUL LAW FIRM, P.A.**  
ATTORNEYS AND COUNSELORS AT LAW

NATIONSBANK TOWER/1301 GERVAIS STREET  
COLUMBIA, SOUTH CAROLINA 29201

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COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE 803/799-9800  
FACSIMILE 803/799-9804

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POST OFFICE DRAWER 418  
GEORGETOWN, SC 29442  
TELEPHONE 803/546-6102  
FACSIMILE 803/546-0096

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TELEPHONE 864/271-4940  
FACSIMILE 864/271-4015

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POST OFFICE DRAWER 7787  
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TELEPHONE 803/785-5169  
FACSIMILE 803/842-3310

MYRTLE BEACH OFFICE  
FOUNDERS CENTRE/SUITE 403  
2411 OAK STREET  
MYRTLE BEACH, SC 29577  
TELEPHONE 803/444-1107  
FACSIMILE 803/444-4729

SPARTANBURG OFFICE  
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101 WEST ST. JOHN STREET  
POST OFFICE BOX 5137  
SPARTANBURG, SC 29304  
TELEPHONE 864/542-1300  
FACSIMILE 864/542-0705

May 2, 1997

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MAY - 5 1997

Willoughby & Hoefler, P.A.

The Honorable Charles W. Ballentine  
Executive Director  
South Carolina Public Service Commission  
111 Doctors Circle  
Columbia, South Carolina 29211

**Re: Application of MCImetro Access Transmission Services, Inc. for a  
Certificate of Public Convenience and Necessity to Provide Local  
Telecommunications Services Throughout the State of South Carolina  
Docket No. 97-115-C**

Dear Mr. Ballentine:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition ("the Coalition") an original and ten (10) copies of an executed Stipulation between the Coalition and MCImetro Access Transmission Services, Inc. in the above-referenced docket. By copy of this letter, I am serving all parties of record.

Please clock-in a copy and return in the enclosed self-addressed envelope.

Thank you for your assistance.

Very truly yours,



Margaret M. Fox

MMF/sg  
Enclosures

cc: Parties of record

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 97-115-C

RECEIVED

MAY - 5 1997

Willoughby & Hoefel, P.A.

Re: Application of MCImetro Access Transmission )  
Services, Inc. for a Certificate of Public )  
Convenience and Necessity to Provide )  
Telecommunications Services )  
Throughout the State of South Carolina )  
)  
)  
)

STIPULATION

The South Carolina Telephone Coalition ("SCTC") and MCImetro Access Transmission Services, Inc. ("MCImetro") hereby enter into the following stipulations. As a consequence of these stipulations and conditions, the necessity for SCTC's intervention in this matter is avoided and SCTC withdraws its opposition to MCImetro's Application. SCTC and MCImetro stipulate and agree as follows:

1. SCTC does not oppose the granting of a statewide Certificate of Public Convenience and Necessity to MCImetro, provided the South Carolina Public Service Commission ("Commission") makes the necessary findings to justify granting of such a certificate, and provided the conditions contained within this stipulation are met.
2. MCImetro stipulates and agrees that any Certificate which may be granted will authorize MCImetro to provide service only to customers located in non-rural local exchange company ("LEC") service areas of South Carolina, except as provided herein.
3. MCImetro stipulates that it is not asking the Commission to make a finding at this time regarding whether competition is in the public interest for rural areas.

4. MCImetro stipulates and agrees that it will not provide any local service, by its own facilities or otherwise, to any customer located in a rural incumbent LEC's service area, unless and until MCImetro provides such rural incumbent LEC and the Commission with written notice of its intent to do so at least thirty (30) days prior to the date of the intended service. During such notice period, the rural incumbent LEC will have the opportunity to petition the Commission to exercise all rights afforded it under Federal and State law. Also, MCImetro acknowledges that the Commission may suspend the intended date for service in rural LEC territory for ninety (90) days while the Commission conducts any proceeding incident to the Petition or upon the Commission's own Motion, provided that the Commission can further suspend the implementation date upon showing of good cause.

5. MCImetro stipulates and agrees that if, after MCImetro gives notice that it intends to serve a customer located in a rural incumbent LEC's service area, the Commission receives a Petition from the rural incumbent LEC to exercise its rights under Federal or State law, or the Commission institutes a proceeding of its own, then MCImetro will not provide service to any customer located within the service area in question without prior and further Commission approval.

6. MCImetro acknowledges that any right which it may have or acquire to serve a rural telephone company service area in South Carolina is subject to the conditions contained herein, and to any future policies, procedures, and guidelines relevant to such proposed service which the Commission may implement, so long as such policies, procedures, and guidelines do not conflict with Federal or State law.

7. The parties stipulate and agree that all rights under Federal and State law are reserved to the rural incumbent LECs, and this Stipulation in no way suspends or adversely

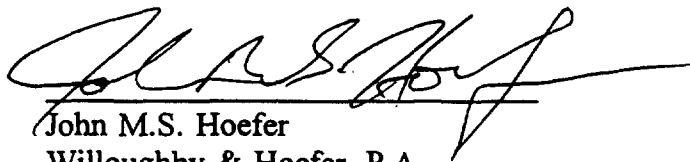
affects such rights, including any exemptions, suspensions, or modifications to which they may be entitled.

8. MCImetro agrees to abide by all State and Federal laws and to participate, to the extent it may be required to do so by the Commission, in the support of universally available telephone service at affordable rates.

9. MCImetro hereby amends its application and its prefiled testimony in this docket to the extent necessary to conform with this Stipulation.

AGREED AND STIPULATED to this 2<sup>nd</sup> day of May, 1997.

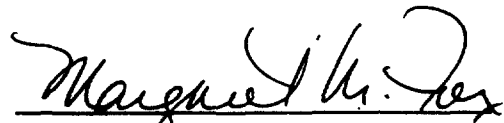
MCImetro Access Transmission  
Services, Inc.:



John M.S. Hoefer  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, South Carolina 29202-8416  
(803) 799-9171

Attorneys for MCImetro Access  
Transmission Services, Inc.

South Carolina Telephone Coalition:



M. John Bowen, Jr.  
Margaret M. Fox  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29201  
(803) 799-9800

Attorneys for the South Carolina  
Telephone Coalition

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 97-115-C

Re: Application of MCImetro Access Transmission )  
Services, Inc. for a Certificate of Public )  
Convenience and Necessity to Provide )  
Telecommunications Services )  
Throughout the State of South Carolina )  
)  
)

CERTIFICATE  
OF  
SERVICE

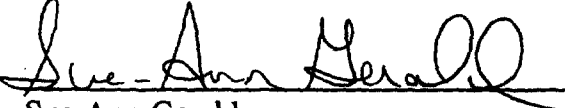
I, Sue-Ann Gerald, do hereby certify that this day I caused to have served the foregoing  
Stipulation to the below named party of record, by having same delivered as indicated, this 2nd  
day of May, 1997, and addressed as follows:

**U.S. MAIL - FIRST CLASS POSTAGE AFFIXED:**

John M.S. Hoefer, Esquire  
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Post Office Box 8416  
Columbia, South Carolina 29202-8416

Elliott F. Elam, Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, South Carolina 29250-5757

Harry Lightsey, Esquire  
BellSouth Telecommunications  
1600 Hampton Street, Suite 821  
Columbia, South Carolina 29201

  
Sue-Ann Gerald

Columbia, South Carolina

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 97-115-C**

In the matter of:

Application of MCImetro Access )  
Transmission Services, Inc. for a )  
Certificate of Public Convenience and )  
Necessity to Provide )  
Telecommunications Services. )

---

**TESTIMONY OF  
GREG DARNELL**

1     **Q:   PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2     A:   My name is Greg Darnell. My business address is 780 Johnson  
3         Ferry Road, Atlanta, Georgia, 30342.

4  
5     **Q:   BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6     A:   I am the Regional Manager of Competition Policy for MCI  
7         Telecommunications Corporation. My responsibilities include  
8         defining what MCI's external policies should be and advocating  
9         those policies throughout the nine BellSouth states.

10  
11    **Q:   PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND**  
12         **EXPERIENCE.**

13    A:   I have a Bachelors degree in Economics from the University of  
14         Maryland and have completed Graduate courses in Electrical  
15         Engineering, Economics and Public Policy at George Washington  
16         University. I have 15 years experience in the  
17         telecommunications industry. My work experience includes



1 obtaining licenses and construction permits for Radio  
2 Stations, anti-trust litigation in MCI vs. AT&T, Corporate  
3 Finance, Business & Economic Analysis, Federal Regulatory,  
4 ILEC Relations and State Regulatory. I have testified on  
5 behalf of MCI in numerous local competition arbitration cases  
6 on resale and ancillary services matters and have written and  
7 filed comments on behalf of MCI in a broad range of tariff and  
8 rulemaking dockets at the Federal Communications Commission.

9  
10 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A: The purpose of my testimony is to present evidence describing  
12 the technical, managerial and financial fitness of MCImetro  
13 Access Transmission Services, Inc. (MCImetro) to provide the  
14 proposed telecommunications services in South Carolina. This  
15 testimony will also describe the services proposed by  
16 MCImetro. Finally, the purpose of my testimony is to show  
17 that the public interest will be served by approval of the  
18 application of MCImetro for a certificate of public  
19 convenience and necessity.

20  
21 **Q: PLEASE DESCRIBE MCIMETRO'S CORPORATE STRUCTURE.**

22 A: MCImetro is a corporation under the laws of the State of  
23 Delaware. MCImetro is a wholly-owned subsidiary of MCImetro,  
24 Inc. which is a wholly-owned subsidiary of MCI  
25 Telecommunications Corporation, or MCIT, which, in turn, is a

1 wholly-owned subsidiary of MCI Communications Corporation, or  
2 MCIC.

3  
4 Q: IS MCIMETRO CURRENTLY AUTHORIZED TO DO BUSINESS IN SOUTH  
5 CAROLINA?

6 A: Yes. MCImetro received authority to conduct business in South  
7 Carolina on September 6, 1995.

8  
9 Q: PLEASE DESCRIBE MCIMETRO'S SERVICES AND HOW THE COMPANY  
10 INTENDS TO PROVIDE THEM.

11 A: MCImetro seeks authority to provide local switched and private  
12 line telecommunications services to the public throughout the  
13 BellSouth, GTE and SPRINT LTD certificated areas statewide,  
14 initially reselling local services and/or using unbundled  
15 network elements obtained from other carriers, and eventually  
16 providing local services via facilities either constructed,  
17 owned, leased and/or managed by MCImetro. MCImetro is not  
18 seeking authority to provide local services in any rural  
19 independent telephone company certified areas at this time.  
20 In addition, MCImetro seeks authority to provide intraLATA  
21 intrastate long distance services throughout MCImetro's  
22 service areas in the State of South Carolina.

1 Q: FROM WHOM WILL MCIMETRO OBTAIN INTRASTATE LONG DISTANCE  
2 SERVICE?

3 A: MCImetro will use MCI Telecommunications to provide its  
4 intrastate long distance service on its administrative lines.  
5 However, MCImetro's customers will be able to choose any long  
6 distance company they want. When MCImetro installs local  
7 switching facilities it will provide 1+ interLATA and  
8 intraLATA equal access to all long distance service providers  
9 -- so that customers can presubscribe or "PIC" the long distance  
10 company of their choice.

11

12 Q: HOW DOES MCIMETRO BILL FOR ITS SERVICES?

13 A: Customers will be directly billed by MCI.

14

15 Q: HOW ARE CUSTOMER BILLING INQUIRIES HANDLED?

16 A: Customers may contact MCImetro for billing inquiries through  
17 a toll free number. The number is printed on each customer  
18 bill. The Center is open 6:00 a.m. to 9:00 p.m. Mountain Time.

19

20 Q: DOES MCIMETRO HAVE ITS OWN CUSTOMER SERVICE DEPARTMENT?

21 A: Yes. Customers may contact MCImetro directly for repair and  
22 maintenance or service inquiries. The toll free number for  
23 MCImetro's Customer Service Department is (800) 374-6400. The  
24 Customer Service Department is open 7 days a week, 24 hours  
25 and day for repair, maintenance and dispatch and from 6:00

1 a.m. to 9:00 p.m. Monday through Friday, Central Time for new  
2 orders and changes of service.

3  
4 Q: IS MCIMETRO AUTHORIZED TO PROVIDE LOCAL SERVICE IN OTHER  
5 STATES?

6 A: Yes. MCImetro is currently authorized to offer service in the  
7 states of California, Connecticut, Delaware, Florida, Georgia,  
8 Illinois, Indiana, Kansas, Kentucky, Maine, Maryland,  
9 Massachusetts, Michigan, Minnesota, Missouri, North Carolina,  
10 New Jersey, New York, Ohio, Oregon, Pennsylvania, Rhode  
11 Island, Tennessee, Texas, Utah, Virginia, Washington, and  
12 Wisconsin. MCImetro is currently pursuing certification and  
13 has applications pending in Alabama, Arkansas, Arizona,  
14 Louisiana, Mississippi and Colorado.

15  
16 Q: PLEASE DISCUSS THE TECHNICAL ABILITY OF MCIMETRO TO PROVIDE  
17 TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA.

18 A: MCImetro will utilize the technical expertise of the  
19 underlying carrier when it is either acquiring unbundled  
20 elements from that carrier or reselling that carrier's  
21 services. MCImetro intends to do both. In addition,  
22 MCImetro's own in-house abilities will be used to augment the  
23 expertise and technical assistance obtained from the  
24 underlying carrier. The company plans to initially utilize  
25 the switching facilities of an underlying carrier with

1 facilities and equipment owned and/or operated by MCImetro or  
2 an underlying carrier.

3  
4 When MCImetro begins to provide facility based local service  
5 it will rely on its own in-house abilities and may augment its  
6 expertise with service contracted for with an Incumbent Local  
7 Exchange Carrier.

8  
9 -- Q: PLEASE DISCUSS THE MANAGERIAL ABILITY OF MCIMETRO TO PROVIDE  
10 TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA.

11 A: MCImetro's own management team includes individuals with the  
12 skills and experience necessary for the successful provision  
13 of quality telecommunications services. The company's  
14 management team consists of professionals with backgrounds in  
15 business management, finance, telecommunications, marketing  
16 and engineering. Brief resumes for MCImetro's key management  
17 personnel were provided as Exhibit "C" to the Company's  
18 Application, which I adopt for purposes of this testimony.

19  
20 Q: DESCRIBE MCIMETRO'S FINANCIAL RESOURCES FOR PROVIDING  
21 TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA.

22 A: MCImetro is financially able to provide service in South  
23 Carolina. As I noted earlier, MCImetro is a wholly-owned  
24 subsidiary of MCImetro, Inc. which is a wholly-owned  
25 subsidiary of MCIT, an interexchange carrier duly registered  
26 to provide interexchange long distance services in South

1 Carolina. MCIT, in turn, is a wholly-owned subsidiary of  
2 MCIC. Exhibits "D-1" and "D-2" to the Application, which are  
3 MCIC's most recent 10-K Report and Annual Report to  
4 Shareholders, demonstrate that MCImetro will have more than  
5 sufficient financial resources to support its proposed  
6 operations in South Carolina. I incorporate these exhibits in  
7 my testimony by this reference.  
8

9 Q: WHY IS IT IN THE PUBLIC INTEREST FOR THE COMMISSION TO GRANT  
10 MCIMETRO A CERTIFICATE TO OPERATE IN SOUTH CAROLINA?

11 A: MCImetro offers competitively priced local service and a  
12 variety of rate plans or service options. The company's  
13 product offerings are easy to understand and provide consumers  
14 with a viable alternative to other carriers. Certification of  
15 MCImetro in South Carolina will permit South Carolina  
16 consumers to take advantage of MCImetro's offerings.  
17

18 In addition, certification of MCImetro will enhance  
19 telecommunications competition in South Carolina. Competition  
20 encourages technological innovation and efficient use of  
21 resources. Increased competition has proven to benefit  
22 consumers by providing a wide variety of services and prices  
23 from which consumers can choose. Finally, price competition  
24 enables consumers to obtain the services they desire at  
25 reasonable prices.

1 Q: DOES MCIMETRO HAVE THE ABILITY TO PROVIDE VIABLE LOCAL  
2 EXCHANGE SERVICES WITHIN SOUTH CAROLINA?

3 A: Yes. I believe MCImetro has the managerial, technical and  
4 financial ability and resources to provide long distance  
5 services within South Carolina.

6

7 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

8 A: Yes.

2 MCIMETDARNELL.TES